

USDC SDNY  
DOCUMENT

ELECTRONICALLY FILED **BADI AK & WILL, LLP**

DOC #:

DATE FILED: 8/30/07

ALFRED J. WILL  
JAMES P. KRAUZLIS  
LISA ANN SCOGNAMILLO

Attorneys and Proctors in Admiralty

106 THIRD STREET  
MINEOLA, NY 11501-4404

TELEPHONE: (516) 877-2225  
TELEFAX: (516) 877-2230/2240  
E-MAIL: ADMIRALAW@AOL.COM

AUG 30 2007

CHAMBER'S OF  
JUDGE ROBERT P. PATTERSON

FLORIDA OFFICE:  
BADI AK, WILL & KALLEN  
17071 WEST DIXIE HIGHWAY  
NORTH MIAMI BEACH, FL 33150  
JOHN D. KALLEN

**VIA TELEFAX: 212-805-7917**

August 30, 2007

The Honorable Robert P. Patterson, Jr.  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSE**

- Re: (2) Insurance Company of North America v.  
CU Transport, Inc., China United Transport, Inc.,  
Kawasaki Kisen Kaisha Ltd., K-Line;  
M/V "EASLINE TIANJIN", etc.  
07 Civ 959 (RPP)
- (3) Reed & Barton Corporation v.  
M.V. Easline Tianjin, in rem, and Yang  
Ming Transport Corp. and  
Unifreight Forwarder Inc.  
07 Civ. 1357 (RPP)
- (4) American Home Assurance Co. *et al.* v.  
Easline Tianjin, *et. al.*  
07 Civ. 2562 (RPP)
- (5) The Travelers, *et al.* v. M/V EASLINE TIANJIN, *et al.*  
07 Civ (RPP)
- (6) Klaussner International LLC v. MV EASLINE  
TIANJIN, etc., *et ano.*  
07 Civ. 3180 (RPP)  
Our Ref.: 07-T-001-JK

Hon. Robert P. Patterson, Jr.  
August 30, 2007

Honorable Robert P. Patterson, Jr.:

We represent the plaintiffs in the action referred to above as (5) and refer to Messers. Hill Rivkins & Hayden, LLP, letter to Your Honor dated August 23, 2007, in which an application was made on behalf of all counsel to request a two week extension until September 14, 2007, for all plaintiffs to file opposition papers to Yang Ming's Motions to Dismiss. As your Honor is aware, two other defendants have filed similar Motions to Dismiss, Hyundai Merchant Marine Co., Ltd. ("Hyundai") and Kawasaki Kisen Kaisha, Ltd. ("K-Line"). We are writing on behalf of the other plaintiffs in the consolidated actions and with the consent of counsel for Hyundai and K-Line to request an identical two week extension for all plaintiff's to file opposition papers to defendants Hyundai and K-Line's Motions to Dismiss.

We make this application as counsel are, as mentioned in Messers. Hill, Rivkin's letter as aforesaid, are engaged in productive settlement discussions and the additional time would permit the parties the opportunity to ascertain if these matters can be resolved on an amicable basis. We would also respectfully suggest it would be most convenient to have plaintiffs' oppositions to the pending motions returnable at the same time.

We request that Your Honor favorable consider this request.

Respectfully submitted,

BADI AK & WILL, LLP

By: 

James P. Krauzlis, Esq.

cc:

ALL COUNSEL OF RECORD VIA TELEFAX

*Application granted  
all plaintiffs to file  
opposition to defendants  
motion to dismiss 9/28/07  
So ordered  
J. P. Patterson  
USDC  
8/30/07*